

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

**AMERICAN GUARANTEE AND
LIABILITY INSURANCE
COMPANY,**

Plaintiff,

V.

ARCH INSURANCE COMPANY,

Defendant.

CASE NO.: 1:25-cv-00204

MOTION FOR LEAVE TO FILE DOCUMENT UNDER SEAL

COMES NOW Plaintiff American Guarantee and Liability Insurance Company (“AGLIC”) and respectfully moves this Court for an Order permitting it to file the document titled “Agreement for Security Guard Services at Retirement Systems of Alabama,” which is a contract between The Retirement Systems of Alabama and Dynamic Security, Inc., under seal. AGLIC requests the agreement be filed under seal until the above styled lawsuit is dismissed, settled, disposed, or reaches a final judgment. The agreement is Exhibit A to AGLIC’s Complaint, and includes or references confidential business information that is subject to a Protective Order in the underlying lawsuit, styled *Megan Bruner v. PCH Hotels and Resorts, Inc.; The Retirement Systems of Alabama; Larry Armstead; Allison Rogers,*

Civil Action No.: 02-CV-2019-9000047-JPP filed in the Circuit Court of Mobile County, Alabama. Therefore, it should not be made part of the public record.

In the underlying lawsuit, the parties reached a settlement agreement, and the court subsequently dismissed the lawsuit with prejudice. However, pursuant to Paragraph 4 of the Protective Order (Doc. 184) filed in the underlying lawsuit, “Any materials designated as “Confidential” shall not be disclosed to any person or entity, except to the parties, trial witnesses, consultants, expert witnesses, counsel in this Lawsuit and their staff, the Court, and Court reports and recorders.”

For these reasons, Plaintiff AGLIC respectfully requests this Court to enter an Order permitting AGLIC to file the “Agreement for Security Guard Services at Retirement Systems of Alabama” under seal.

Respectfully submitted this the 14th day of May, 2025.

Respectfully Submitted,

s/Joel S. Isenberg
Joel S. Isenberg (ASB-8855-N76J)
William W. Bramlett (ASB-1273-E68B)
Counsel for Plaintiff American Guarantee
and Liability Insurance Company

OF COUNSEL:

PORTERFIELD, HARPER, MILLS,
MOTLOW & IRELAND, PA
22 Inverness Center Parkway, Suite 600
Birmingham, AL 35242
(205) 980-5000 / (205) 980-5001 Fax
jsi@phm-law.com
wwb@phm-law.com

CERTIFICATE OF SERVICE

I do hereby certify that a true and accurate copy of the foregoing has been served on all parties of record via U.S. Mail on this the 14th day of May, 2025.

Arch Insurance Company
c/o Corporation Service Company, Inc.
641 South Lawrence Street
Montgomery, AL 36104

s/Joel S. Isenberg
OF COUNSEL